

AZVIDEO

(AZEVEDO) MEDIA



October 13, 1995

DOCKET FILE COPY ORIGINAL

The Secretary
FCC
1919 "M" Street N.W.
Washington, DC 20554

RECEIVED
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FCC MAIL ROOM

To: Whom it may concern:
RE: Docket No. 87-268

Modesto California, in the heart of the the San Joaquin Valley, an agriculturally based city, now has a population of 180,000 people. . .There are approximately 500,000 people in our LPTV's coverage area. We are the center of a triangle approximately 80 miles from San Francisco, Fresno and (our ADI) Sacramento. When it comes to localized television information, entertainment and sports programming, our general population is greatly under served.

I am a 47 year old man who was born and raised in Modesto to a third generation farming family. In addition to the family farming, I have been successfully involved in the advertising and the media communications business for many years. Because of new technology, I know that a Low Power Television Station can serve the public interests with much localized programming and be cost effective (even though I know it will not be an easy task).

We have purchased all of the equipment (depleting our life savings) and are scheduled to be on air in January with our (my life long dream) own television station Channel 14 serving the greater Modesto area.

No. of Copies rec'd
List ABCDE

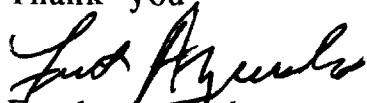
029

I know from experience (see the attachments) that high school games, parades, the county fair, specialized weekend festivals, political debates and other local programming can be produced successfully . . . and spot announcements that target our area. We currently do this on cable. But, there are approximately 10 cable headends (in our LPTV's coverage area = our community) hence we lose control and lose quality. Our LPTV will serve this community much better than running tapes all over our three county area. Cable has about 70% penetration and then only in the cities. There are a lot of "farm people", and some others, who depend on off air television. Plus, cable is now finally really facing competition, and these new programming sources will not be able to serve the local public with original programming.

Please drop the secondary status for LPTV's. Treat us like full power . . . including "must carry" at least for television stations that really do serve the localized public interests.

Most of the LPTV stations that truly serve local community needs are small owner operated businesses . . . The true American dream . . . please look out for us.

Thank you



Frank Azavedo

Owner / General Manager

Attachments

c.c. U.S. Congressman Gary Condit

THE

Power
OF

TARGETED

TELEVISION ADVERTISING

Local Ad Insertions in National TV Networks

A-Z-VIDEO

(Azevedo Video)

MEDIA SERVICES

2731 Iowa Avenue • Modesto, CA 95358

(209) 577-0743

FAX (209) 577-0401

Modesto Fringe Area

• Riverbank • Escalon • Ripon • Lathrop • Salida •
• Modesto's Del Rio Country Club & East Yosemite Blvd. Area •
• Empire • Hughson • Waterford • Hickman

Sonic Cable Systems, Inc.

9,400 Cable Subscribers

70% Penetration

CNN
CH 18

ESPN
CH 20

USA
NETWORK
CH 27

TNT
CH 15

All Systems Interconnect

34,400 Cable Subscribers

Ceres Area

• Ceres • S. E. Modesto •

Sammons Cable Systems, Inc.

8,500 Cable Subscribers

70% Penetration

CNN
CH 28

TNT
CH 39

ESPN
CH 33

TNN
CH 31

USA
NETWORK
CH 42

Discovery
CH 40

LTV
CH 32

LIFETIME
TELEVISION
CH 36

Turlock Area

• Turlock • Denair • Hilmar • Delhi • Keyes •

Sammons Cable Systems, Inc.

16,500 Cable Subscribers

75% Penetration

CNN
CH 28

TNT
CH 39

ESPN
CH 33

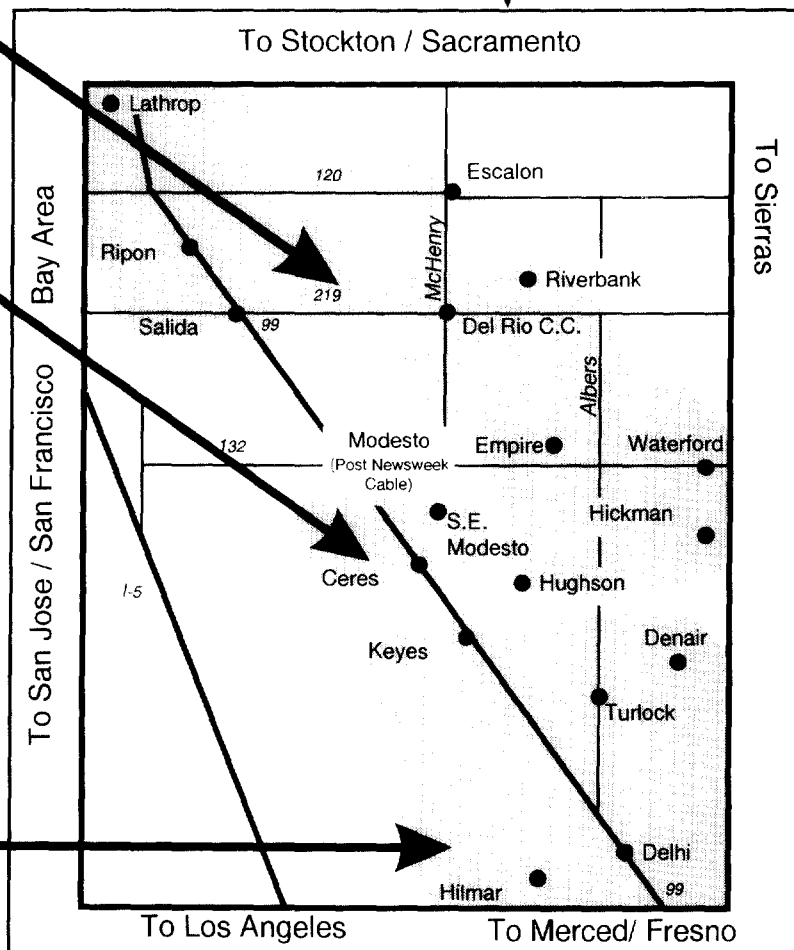
TNN
CH 31

USA
NETWORK
CH 42

Discovery
CH 40

LTV
CH 32

LIFETIME
TELEVISION
CH 36



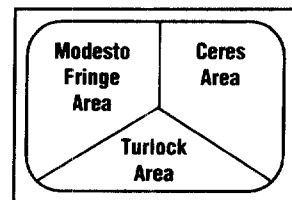
A-Z-video is contracted by Sammons and Sonic to provide the exclusive "TURN-KEY" advertising service.

EFFECTIVE 9/93



A-Z-VIDEO (Azevedo Video) MEDIA SERVICES

2731 Iowa Avenue • Modesto, CA 95358
(209) 577-0743 • FAX (209) 577-0401



ABOUT A-z-video Media Services

- Contracted by Sammons and Sonic Cable Companies to provide the exclusive "turn-key" local spot advertising insertion service into National Satellite Networks.
- A-z-video Media Services has been in business serving our local communities since 1987. Our staff of full time account executives, production specialists and data fiscal support personnel have over 50 years of combined professional experience.
- Since 1966, Frank Azevedo has been employed primarily in television production as well as an advertising executive, media specialist, and a teacher. Frank is proud to be a lifelong farmer!

VIDEO PRODUCTION SERVICES

A-z-video Media Services makes available:

- Standard and custom spot production packages.
- A complete business, industrial, educational, cablecast and broadcast production and duplicating service.
- In-house hardware -- comparable to most cable systems that provide production services, as well as to many broadcast television stations.
- Producers of local television programming.
- Media training and consulting services.
- See our VHS demo, information and rate sheets.

YOU CAN ADVERTISE ON THESE NETWORKS!



Cable News Network

24 hour, in-depth coverage and analysis of major national and international events and daily programs covering business, sports, science, entertainment, and weather. Comprehensive live coverage of breaking news around the world.

Men.....52%	AGE	25-3427%
Women.....48%	2-17.....0%	35-4930%
	18-2.....9%	50 plus...34%



The Total Sports Network

24 hour schedule featuring professional, collegiate and amateur sports along with sports news and information programs and a morning business news program. Owned by ABC.

Men.....64%	AGE	25-3431%
Women.....36%	2-17.....3%	35-4929%
	18-24.....31%	50 plus...20%



America's Favorite Cable Network

USA is the top rated basic cable originated network featuring top quality programming for every member of the family. USA's lineup is a blend of original series, movies and programs for teens, as well as exclusive suspense and dramatic series, cartoons, and high-profile professional and collegiate sports.

Men.....39%	AGE	25-34.....38%
Women...61%	2-17.....2%	35-49....30%
	18-24....15%	50plus...15%



MTV: MusicTelevision™ is the only 24 hour video music network for 12-34 yr olds. Presented in stereo, MTV's overall environment is irreverent and unpredictable, always on the cutting edge.

79%.....12-34
74%.....18+
Median Age: 23.4
Median Income: \$39,015



Turner Network Television

TNT presents a lineup of high-quality programming that offers viewers classic movies, blockbuster original specials, NBA basketball, World Cup Soccer and exclusive children's programs.

Men.....64%
Women...54%

Median Age: 39 Years



LIFETIME TELEVISION

24 hour original and first-run programming specifically targeted to the female viewer. HQ primetime entertainment: movies, specials, documentaries. "Doctor's Sunday," award winning programming for medical professionals, airs all day Sundays.

Men.....10%
Women....90%



The Discovery Channel presents the world's finest non-fiction entertainment, exploring nature and the environment, science and technology, history, adventure, and the people who share our world.

Men.....60%
Women....40%



The Nashville Network

TNN: The Nashville Network is America's number one source of country music entertainment offering live variety, country lifestyle information, original concert specials, entertainment news, exclusive sports coverage and original drama.

Men	MON-FRI .. 44%	SA-SU.. 66%
Women	MON-FRI .. 56%	SA-SU.. 44%
Median Age: 44 Years		



AZVVIDEO
(AZEVEDO) **MEDIA**



**"In Our Part
of The Valley"**

A Weekly Local
Television Program

Featuring
**Community Information, Entertainment,
Local Sports and more**

Watch Sammons Cable Channel 9

Wednesdays 7:30 p m
Thursdays 12:00 noon
Fridays 2:00 p m
Sundays 7:30 p m

An A-z-video Media Production
For more information phone 577-0743



AZVIDEO
(AZEVEDO) MEDIA



DON'T MISS THIS ONE

PLAYBACK TIMES

SAMMONS

Sunday 9:30 pm

Monday 9:00 pm

SONIC

Monday 5:30 pm

CABLE CHANNEL 9

1995 LOCAL HIGH SCHOOL FOOTBALL



LOCAL HIGH SCHOOL FOOTBALL GAMES

SPECIAL ADVERTISING RATES ON REVERSE

<u>DATE</u>	<u>TEAMS</u>
Friday, Sept. 8	Oakdale/Ripon (R)
Friday, Sept. 15	Turlock/Davis (MJC)
Friday, Sept. 22	Turlock/Beyer (T)
Friday, Sept. 29	Turlock/Merced (T)
Friday, Oct. 6	Denair/Central Catholic(D)
Friday, Oct. 13	Turlock/Johansen (T)
Friday, Oct. 20	Escalon/Riverbank (R)
Friday, Oct. 27	Turlock Police League (T)
Friday, Nov. 3	Ceres/Oakdale (C)
Friday, Nov. 10	Escalon/Hughson (H)

PURCHASE MASTER QUALITY VHS TAPES

This is AZVideo-Media's third High School Football video production season. Gary Potter, our on and off-camera announcer, is a well known local sports announcer and District Manager of American Express Financial Advisors. On-camera interviews with coaches, celebrities, and some half-time coverage will also be recorded.

These television programs are sanctioned by the local High Schools and are copyrighted.

2731 Iowa Ave. • Modesto, CA 95358 • BUS (209) 577-0743 • FAX (209) 577-0401

Stop by and say "hello"

(we're outside between the Grange and Commercial buildings)

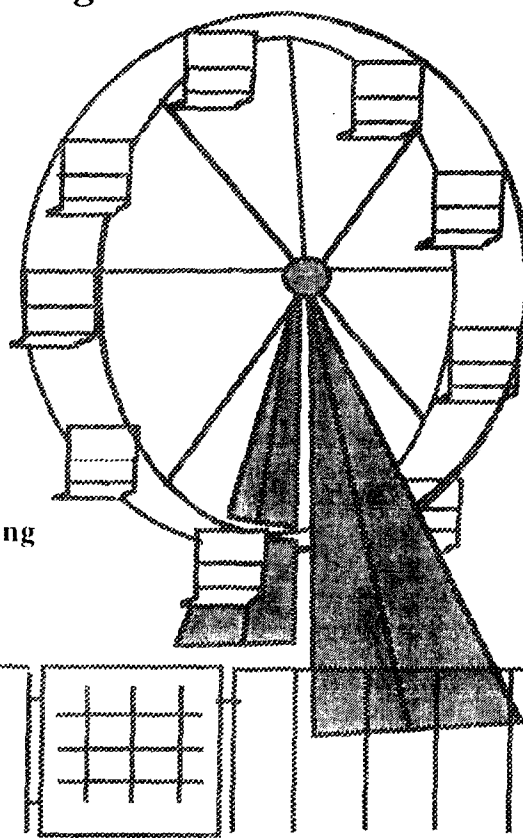
Sammons Communications & AZVIDEO MEDIA

at the 1995 Stanislaus County Fair
July 27th - August 5th

CABLECASTING LIVE

Be part of our T.V. programs
into 25,000 cable homes.

Watch our live and taped T.V. programming
signing on Sammons Cable channel 9
many times during Fair hours.



Azevedo Video Services

Cable Television Advertising
Complete Video Production

2731 Iowa Avenue • Modesto, California 95351 • (209) 577-0743 • Fax (209) 577-0401

JOIN US
FOR THE 2ND ANNUAL

Farmer's Market Television Program LIVE

FROM DOWNTOWN TURLOCK

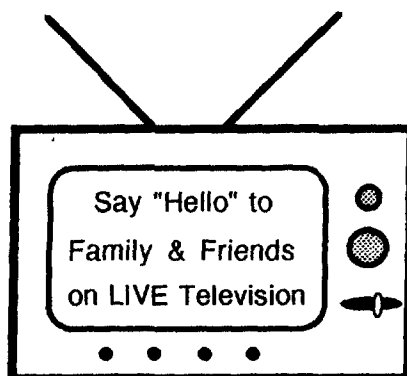
September 24, 1992
Thursday 7:00 - 9:00 pm

Meet local
Sports Figures



Drawings for
Free Prizes
donated by
local merchants

Find out from
Farmer's Market Participants
why it's **GREAT!**
Now What?

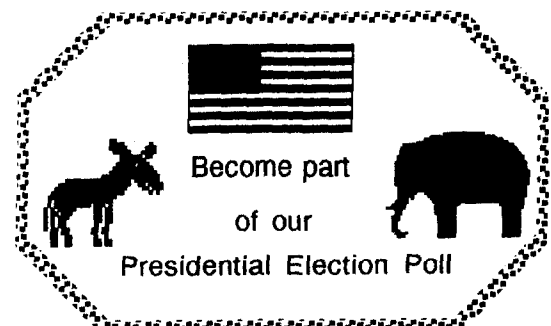


Program will play again:

Sept. 26, 1992
Sat. 5:00 - 7:00 pm

&

Sept. 29, 1992
Tues. 7:00 - 9:00 pm



All 3 showings can be seen on Sammons Cable channel 17
in the following communities:

Turlock Hilmar Ceres So. Modesto
Denair Delhi Keyes

Advertising space is available

MAC II, 08/26/92

A-Z-VIDEO MEDIA SERVICES

(Azevedo Video)

Local Television Advertising
Complete Video Production

2731 Iowa Ave. • Modesto, CA 95358 • BUS (209) 577-0743

HALLOWEEN LIVE !!!



The Fourth Annual Community-Wide Halloween Carnival In Downtown Turlock

Monday Evening . . . October 31st

WHERE: East Main Street . . . Between Thor Street and the Salvation Army Store alley.

TIME: 4:15 Costume Walk
4:30 - 8:30 . . Events (Includes a "Haunted House" in the Endsley Building.

A-Z VIDEO/MEDIA WILL BE HERE TOO !

Broadcasting "LIVE" on Sammons Public Access Channel 9.
PLUS Playbacks: Wed..2:30 pm, Thurs...2:30 pm, Sun...8:00 pm

SPECIAL LOCAL ADVERTISING PACKAGE:

-1 WEEK OF PROMOTION ON CABLE NETWORKS IN THE TURLOCK SAMMONS SYSTEM.

-SPOTS INCLUDED IN THE PRODUCTION OF "HALLOWEEN LIVE" ON CHANNEL 9 (including playbacks) (Can Be Simple 'Read-Only' productions)

ALL FOR THE LOW, LOW PRICE OF ONLY \$150.00 (one spot)
DEADLINE : October 14, 1994



Sponsors:
City of Turlock
Parent Teachers Association
Turlock Downtown Association
'Hot 105' Radio



AZVVIDEO
(AZEVEDO) **MEDIA**



MEASURE "F" POLITICAL DEBATE

WEDNESDAY OCTOBER 18, 1995

**JOIN US AT 7:00 PM AT THE TURLOCK HIGH
SCHOOL PERFORMING ARTS BUILDING**

**FOR THOSE UNABLE TO ATTEND, THERE WILL
BE PLAYBACKS OF THE DEBATE ON SAMMONS
CABLE TELEVISION CHANNEL 9 SEVERAL TIMES
DURING THE WEEK**

TURLOCK'S 1992
CHRISTMAS
PARADE

Watch Sammons Cable
Channel 17

Dec. 24th, 25th & 26th
at 3 pm

See your friends and neighbors

Master Quality VHS copies may be purchased from Azevedo Video Services
for \$35.00 each. Please send check and return address to us.

Allow up to 6 weeks for arrival.

Locally produced television is copyrighted. All rights reserved.

Stop by and say "hello"

**Sonic Cable Television
&
AZVIDEO MEDIA**

**at the 1995 Riverbank
Wine & Cheese Festival
October 14th & 15th**

**CABLECASTING
LIVE**



Be part of our live T.V. program into 10,000 cable homes.

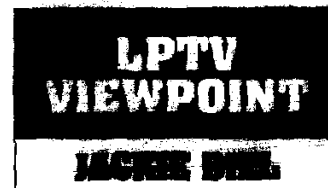
FCC Up To Its Old Tricks Concerning ATV, LPTV

The FCC has done it again.

On August 9, the agency released its Fourth Further Notice of Proposed Rule Making and Third Notice of Inquiry in the advanced television proceeding that began in July 1987. It was no surprise that LPTV broadcasters were again not included in the category of "eligible broadcasters" who will be allocated an extra 6 MHz of spectrum for HDTV transmission.

It was no surprise because it seems that no matter what we do or how much noise we make, and no matter how sympathetic the Commissioners might be in private, the FCC refuses to recognize LPTV officially as a viable broadcasting service.

The FCC's 36-page document refers on virtually every page to the importance to the public of "free, over-the-air, universal broadcast television." In this document, and every other policy proceeding over the years, the FCC mentions the "public interest" and the importance of local programming and information diversity. Yet the



Fourth Further Notice refers to LPTV only on the second-to-last page in a one-paragraph section acknowledging the potential impact of the proceeding on "small entities." To add insult to injury, this last section is the "Initial Regulatory Flexibility Act Statement," required by law. The document proper doesn't mention LPTV at all.

What's the problem?

One FCC official told me that LPTV broadcasters have been invisible. Only "two or three" LPTV broadcasters filed comments in earlier stages of this proceeding,

instead of the "200 or 300" that he felt would have made an impact.

I don't know how many LPTV broadcasters have commented since the proceeding began in 1987. I know the Community Broadcasters Association has been very active ever since 1990 when it became apparent that a simulcast standard would be adopted. There was concern then that LPTV stations would be displaced from their channels to make way for the extra spectrum needed by full power stations.

(continued on page 53)

FCC AND LPTV

(continued from page 1)

In November 1990, then-FCC chairman Al Sikes, speaking via satellite to the CBA convention in Las Vegas, said the status of LPTV stations would "undoubtedly be addressed" during the HDTV proceedings. Yet when the FCC released its draft table of HDTV allotments in August 1992, it categorically excluded LPTV stations from the table because of their "secondary status." At the time, we were incensed that the FCC — leaning on a single word, "secondary," with a strict denotation, "signal interference" — chose to ignore the local programming that hundreds of community broadcasters were providing their viewers, as well as the diversity that

broadcasting when the conversion is complete.

Because LPTVs cannot apply for HDTV channels until after all "eligible broadcasters" have been given channels, they would have to compete for spectrum with any and all other applicants. The process for awarding leftover HDTV channels has not been defined, but the FCC has not indicated that LPTV broadcasters, even licensees of long standing, would be given preference over other applicants. This means that it is possible for a successful LPTV station to be kicked off the air by a new applicant.

What's more, Dick Bogner, president of Island Broadcasting's four New York City LPTV stations, thinks that repacking the spec-

trum will eliminate LPTVs entirely because the FCC will allow only enough channels for full power stations. In other words, after the 1990 draft allocation table was published, we took comfort in the thought that, because digital technology would make dozens of additional channels possible, LPTV broadcasters could also be accommodated, albeit later in the transition. Bogner fears that the FCC, greedy for unencumbered spectrum, may reclaim much more than they originally planned.

Third, the FCC proposes to reduce the time that eligible broadcasters may apply for specific ATV channels from three years to six months. This would allow early identification of potential ATV channels that new appli-

cants could apply for. It might be possible then for LPTV broadcasters to reserve ATV channels, but the problem remains that they would have to compete with all other applicants for the channels. And if the Commission decides to auction the extra spectrum, there is nothing to protect LPTV licensees from losing their channels to high bidders who may not even be broadcasters.

CBA general counsel Peter Tannenwald finds it "encouraging" that the Commission is requesting comments on what to do with the reclaimed spectrum. "It could be a chance for us," he says. CBA president Sherwin Grossman says he plans to meet again with Hundt to reiterate LPTV's stance.

(continued on page 60)

bringing to a television industry that had been dominated for decades by a handful of companies.

Soon thereafter, 16 LPTV broadcasters met with then-Commissioner Ervin Duggan to discuss ways to achieve more parity with full power stations as advanced television was implemented. And also that year, it became apparent that digital technology would permit much closer spacing of television channels, thus allowing enough room for everyone, LPTVs included.

In January this year, the Association for Maximum Service Television (MSTV) and the Broadcasters Caucus came out with their own allocation table based on the newer data about channel spacing. However, to no one's surprise, MSTV omitted any calculations for LPTV stations. In response, CBA president Sherwin Grossman, along with several LPTV broadcasters, met with Chairman Reed Hundt and convinced him to allow us to create our own allocation table using the same data that MSTV used. That table is now being prepared.

How Much Noise?

The point here is that LPTV people have been making noise. But maybe not enough. A lot of people in the industry think HDTV is a dream that will never be real because of the costs involved for both broadcasters and the public. But the Commission, like it or not, is going ahead; and whether the public wants HDTV it or not, it looks like they're going to get it.

LPTV broadcasters need to read this Fourth Further Notice and send comments to the Commission. Meetings are good, but the Commission must make its policy decisions based on the public record. If there are no comments, the Commission can't act to correct our situation.

The stakes are higher now, too. In this Fourth Further Notice, the Commission introduces several new ideas. First, backing off from the idea of expensive, high-definition transmitters and consumer TV sets, the agency is now suggesting that digital technology may be used to allow multiple streams of Standard Definition Television (SDTV) programming over one channel.

Secondly, the Commission is proposing that when the conversion to digital is complete, station channels be rearranged, or "repacked," so that each market's stations occupy a contiguous block of spectrum. Then the remaining spectrum would be returned to the FCC for "as yet undefined" uses, possibly for auction.

The Notice does not indicate whether LPTV stations would be included in the channel rearrangement. Presumably, those LPTVs that have made the conversion to digital transmission would stay on the air on their new channels. But all NTSC stations must cease

LPTV

(continued from page 53)

Communications attorney Ben Perez says that the new questions opened in this Notice could be a "blessing." Whereas the Sikes FCC was "openly hostile" to LPTV, he explains, this one is neutral on the issue. "But," Perez cautions, "unless the LPTV industry does a much better job of pushing its agenda than it did in 1992, this rule making will be disastrous for us."

All A Myth

Dick Bogner thinks the whole idea of a second channel is a "myth." Bogner, an engineer who consulted with the FCC as they developed the 1990 draft allocation table, believes that the costs of the conversion, at least as it is envisioned now, will be too much for the country to bear. He also thinks, however, that LPTV broadcasters should begin now to move to a channel that would be unlikely to be claimed for HDTV. For that reason, he says, he just changed his own channel 38 to 39. "I really think just sitting back and waiting to get clobbered is not a good idea."

It certainly is clear that the LPTV industry has to make a concerted effort if we are to save ourselves. Each and every LPTV broadcaster *must* file comments in this proceeding. Volume counts.

The FCC says it is committed to preserving free, over-the-air broadcasting. By law it must serve the public interest, and it has stated many, many times that the public interest is best served by localism and diversity of broadcast ownership. The LPTV industry was created to provide localism and ownership diversity to communities that were and still are unserved by traditional full-power television, and we have proven many times over that we can do just that. Now it's time to make the contributions of each and every community station part of the public record. If you don't, no one else will.

Here's how to get a copy of the Notice. Write or call International Transcription Service, 2100 M Street, NW, Suite 140, Washington, DC 20037; (202) 857-3800. Ask for a copy of MM Docket No. 87-268, Fourth Further Notice of Proposed Rule Making and Third Notice of Inquiry. The cost, including shipping, is under \$20, and ITS takes American Express, Visa, or MasterCard.

Comments are due October 18, and reply comments are due December 4. To file formally, send an original and five copies of all comments, reply comments, and supporting comments to the Secretary, FCC, 1919 M Street, NW, Washington, DC 20554. Send an additional five copies if you want each commissioner to receive a personal copy. The extra postage and photocopying costs are worth it.